

LOCAL BANKRUPTCY FORM 9013-3

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

Daniel J. Baer
aka Baer's Buses, Grocery & Repair

Debtor(s)

Plaintiff(s)/Movant(s)

vs.

Defendant(s)/Respondent(s)

CHAPTER 13

CASE NO. 1 - 17 .bk- 00913-HWV

ADVERSARY NO. - .ap-
(if applicable)

Nature of Proceeding: Application to

Approve Employment of Consultant

Document #: 179

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance.

Sale of real estate necessary to fund application will not close before the hearing scheduled for September 24, 2019. Parties request a rescheduled hearing for October 29, 2019.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: 9/6/19

/s/ James K. Jones

Attorney for Trustee

Name: James K. Jones

Phone Number: 717-566-6097 x-123

¹ No alterations or interlineations of this document are permitted.

² If this is not a first request for a continuance, then a Motion to Continue must be filed.